



## Clayton County HD Building February 13, 2008

### Introduction

On May 18, 2007, the Georgia Department of Public Health (GDPH) responded to a resident's request to evaluate the potential for exposure to toxic chemicals from past industrial operations at the Clayton County Health Department office building in Jonesboro, Georgia.

### Site Description and History

In 2003, the Clayton County Commission purchased property to use as the District 3-3 Health Department, located in Jonesboro, Georgia. A title search showed that the property was first deeded to Atlanta Wire Works, Inc. in 1969. Under several corporations, the facility manufactured synthetic forming fabric for paper mills until 2003, when it was sold to Clayton County. In general, these processes do not use or generate toxic chemicals. However, the machinery used likely required cleaning with large quantities of regulated toxic solvents.

Because this facility was once an industrial facility, GDPH looked into whether it had ever held any permits. This would show if there were quantities of regulated chemicals generated and the allowable amounts released to the environment through air emission and water discharge permits. In addition, the facility was searched under federal and state "Superfund" databases. No history of known or suspected releases to the environment above allowable regulatory levels (including spills) was documented. According to the Georgia Environmental Protection Division (GEPD) and the U.S. Environmental Protection Agency (EPA), the facility did not hold a federal identification number, meaning that no owners were a regulated generator of hazardous waste.

During the late 1990s, Atlanta Wire Works had a Georgia Radioactive Materials license and a U.S. Nuclear Regulatory Commission (NRC) license to operate a portable gauge that contained a sealed radioactive source. According to Georgia Radioactive Materials Program staff, in 1998 they issued one Notice of Violation for performing late leak tests. No radioactive material releases or exposures occurred. The last inspection of the facility under the state license was

conducted by the state in 1998, and the license was then terminated.

Under the federal NRC license, an inspection was conducted by the NRC in January 2000. Based on the results of this inspection, the NRC determined that two violations of license requirements occurred: (1) the failure to notify the NRC of a field storage location change (in Indiana), and (2) the failure to obtain NRC consent in writing prior to the transfer of the license from JWI Group, Inc. to Asten Johnson, Inc. These issues were resolved and the federal license was terminated in August 2000.

In response to our investigation, the Georgia Radioactive Materials Program stated there are no safety or security concerns regarding radioactive materials historically used on the facility property, and that all radioactivity containing devices were properly removed from the facility prior to the final license termination in 2000.

### Environmental Sampling

During renovations conducted in May 2003, an inspection indicated the presence of both lead and asbestos. The renovation contractor issued a letter stating that all lead and asbestos-containing materials were completely abated following state and federal abatement procedures. In August 2006, staff from the state and district health offices and the GEPD, Lead Paint and Asbestos Program conducted an abbreviated walk through of the premises, during which time several areas reflecting the buildings prior industrial uses were observed including the gross appearance of what appeared to be remnants of asbestos-insulated pipes, ceiling tiles, dust and debris from renovation activities, and several other building materials and locations. Subsequent roof replacement activities conducted in early 2007 resulted in roof debris entering some workspaces. In addition, based on site geology information summarized in the Phase 1 Assessment, the underlying substrata would indicate a higher risk for radon gas.

In response, during September 2006, a records search by GEPD revealed that the building was renovated and



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Atlanta, GA



inspected under federal laws and guidelines for proper lead and asbestos removal. However, to further ensure the safety of staff and clients, pipes and other materials of concern, roof renovation debris, and indoor air were sampled and analyzed for asbestos by a licensed contractor hired by the Clayton County Board of Health in December 2006.

**Results**

Results showed that no asbestos was found in any sample. At that time, indoor air was also sampled for radon gas using approved methods, and results do not indicate elevated levels of radon anywhere in the building. Based on the apparent thoroughness of asbestos removal, and lead and asbestos removal and inspection records, no other sampling was recommended.

**Conclusions**

Based on available data, there is no evidence that staff and clients are at risk for exposure to toxic chemicals from past industrial operations at this facility, therefore the building poses ***no public health hazard***. Results of this environmental regulatory and health investigation do not warrant further exposure or risk assessments regarding past operations.

**Recommendations**

There are no recommendations at this time.